

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA, MIAMI DIVISION**  
Case No. 1:23-md-03076-KMM

**IN RE:**

**FTX Cryptocurrency Exchange Collapse Litigation**

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This Document Relates To:

*O'Keefe v. Sequoia Capital Operations, LLC, et al.*,  
Case No. 23-cv-20700 (S.D. Fla.)

*O'Keefe v. Temasek Holdings (Private) Limited, et al.*,  
Case No. 3:23-cv-03655 (N.D. Cal.)

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**RESPONSE IN OPPOSITION TO PLAINTIFFS' MOTION TO APPOINT SPECIAL  
MASTER BY DEFENDANT TEMASEK HOLDINGS (PRIVATE) LIMITED**

Defendant Temasek Holdings (Private) Limited ("Temasek") respectfully submits this opposition to Plaintiffs' Motion to Appoint Judge Michael A. Hanzman as the FTX Special Master, ECF No. 145. Temasek agrees with the Opposition filed by the Investor Defendants, ECF No. 180, that appointment of a special master is premature at this stage. Temasek further notes that, to the extent Plaintiffs argue that discovery is necessary at this stage in part because certain defendants continue to contest personal jurisdiction, ECF No. 145 at 3, Plaintiffs are mistaken. First, as the Investor Defendants point out, Plaintiffs' point is moot now that the Court has stayed discovery. Second, should discovery be reopened, Temasek is prepared to demonstrate that no discovery as to Temasek is appropriate pending the Court's determination on Temasek's forthcoming motion to dismiss for lack of personal jurisdiction. Temasek files this opposition without waiver of its defense of lack of personal jurisdiction, which Temasek expressly preserves.

Dated: August 11, 2023  
Miami, Florida

Respectfully submitted,  
  
FRIDMAN FELS & SOTO, PLLC

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